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October 7, 2014

BY ECF

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Ross Ulbricht*,
14 Cr. 68 (KBF)

Dear Judge Forrest:

This letter is submitted on behalf of defendant Ross Ulbricht, whom I represent in the above-captioned case along with Joshua L. Dratel, Esq., and Joshua J. Horowitz, Esq., in regard to the Court's Order requesting that defense counsel notify the Court by 5 p.m. today if Mr. Ulbricht intends to submit a declaration or affidavit in support of his motion. Mr. Dratel, who is lead counsel in Mr. Ulbricht's case, has been on trial for the past week in *United States v. Antione Chambers*, 13 Cr. 345 (LGS). The jury began deliberations late afternoon, Friday, October 3, 2014, and it has not yet reached a verdict. Thus, Mr. Dratel must remain at the courthouse until the conclusion of the case. Accordingly, it is respectfully requested that defense counsel be permitted to respond to the Court's Order after Mr. Dratel's trial is concluded and he has had an opportunity to consult with Mr. Ulbricht.¹ We anticipate that we will be able to respond no later than close of business Thursday, October 9, 2014.


I have spoken with Assistant United States Attorney Serrin Turner and he has informed me that the government objects to this application. However, there is no articulable prejudice to the government as a result of an extra day or two for response.

¹ It should also be noted that it is currently more time-consuming than usual to enter the MDC Brooklyn due to the implementation of new security protocols at the entrance.

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Accordingly, it is respectfully requested that defense counsel be permitted to respond to the Court's Order after Mr. Dratel's trial is concluded.

Respectfully submitted,


Lindsay A. Lewis

LAL/

cc: Serrin Turner
Timothy T. Howard
Assistant United States Attorneys